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April 16, 2024

VIA ECF

Hon. James R. Cho, U.S.M.J.

United States District Court Eastern District of New York

225 Cadman Plaza East, Courtroom 11D

Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)
MLLG File No.: 25-2022

Dear Judge Cho:

This office represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case.

The parties write to jointly respectfully request an extension of time from April 30, 2024 until July 31, 2024 to complete discovery. The reason for this request is that a hearing to discuss several pending motions, along with an evidentiary hearing, is scheduled before Judge Chen on May 29, 2024 which has and will continue to occupy the parties’ time. Moreover, there are pending motions to dismiss by defendants and the co-defendants.

The parties have agreed, if the Court permits, to exchange outstanding responses to document demands by June 15, 2024 and to schedule depositions thereafter.

This is the third request by any of the parties to extend the discovery deadline. On November 8, 2023, the Court granted Defendants’ motion to extend the discovery deadline. On December 12, 2023, the Court granted the parties’ motion to extend the discovery deadline.

The parties thank this Court for its time, attention, and anticipated courtesies in this case.

Respectfully submitted,

/s/ Jamie S. Felsen, Esq.